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February 16, 2024

Chambers of Hon. Robert B. Kugler
United States District Court for the District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th and Cooper Streets
Camden, New Jersey 08101

Special Master the Honorable Thomas Vanaskie
Stevens & Lee
1500 Market Street, East Tower
18th Floor
Philadelphia, PA 19103

RE: *In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation*
United States District Court for the District of New Jersey, Case No.: 1:19-md-2875

Dear Judge Kugler and Special Master Vanaskie:

I write to update the Court regarding discussions between counsel regarding production of irbesartan and losartan dispensing data from pharmacies, pursuant to Special Master Vanaskie's order during the February 1, 2024 status conference.

Counsel representing several pharmacies conferred with Conlee Whiteley on behalf of Plaintiffs on February 14, 2024. Subsequent to that meet and confer, counsel for the Pharmacies provided Ms. Whiteley with a proposal regarding production and timing of the requested information. Pharmacy counsel and Plaintiffs' counsel believe further discussions may be beneficial, and we will continue to meet and confer regarding production of the irbesartan and losartan dispensing data. We will seek guidance from the court at a future time, if needed.

Respectfully submitted,

A handwritten signature in blue ink that reads "Kara Kapke".
Kara Kapke